

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

GOOGLE INC.

PLAINTIFF

v.

Civil Action No. 3:14-cv-981-HTW-LRA

JIM HOOD, in his official capacity
as Attorney General of the State of
Mississippi

DEFENDANT

**ATTORNEY GENERAL JIM HOOD'S REPLY IN SUPPORT OF MOTION TO
COMPEL INTERROGATORY RESPONSES**

COMES NOW, Jim Hood, Attorney General of the State of Mississippi, in his official capacity ("Attorney General"), and files his Reply in Support of Motion to Compel Interrogatory Responses.

The Attorney General served Google with a mere six interrogatories, each very specific to allegations plead in Google's Complaint. Google has wholeheartedly failed to provide substantive responses to any of the interrogatories.

For the reasons stated in Attorney General Jim Hood's Memorandum of Law in Support of Motion to Compel Interrogatory Responses and the Reply Memorandum in Support of Motion to Compel Interrogatory Responses, the Attorney General respectfully requests the Court to order Google to (1) provide adequate, substantive and responsive answers to Interrogatory Nos. 1-6; and, (2) provide a proper verification for its interrogatory responses as a party to this litigation or waive any assertion of attorney-client privilege as to the facts upon which Google relies for its responses.

Pursuant to Local Rule 7(b)(6)(A), the Attorney General requests oral argument on the motion.

Dated this 27th day of October, 2015.

Respectfully submitted,

JIM HOOD, in his official capacity as
Attorney General of the State of Mississippi

s/ John W. Kitchens
John W. Kitchens

John W. Kitchens, (MSB# 101137)
KITCHENS LAW FIRM, P.A.
Post Office Box 799
Crystal Springs, MS 39059-0799
Telephone: 601-892-3067
Facsimile: 601-892-3057
jkitchens@kitchenslaw.net

Douglas T. Miracle (MSB # 9648)
Special Assistant Attorney General
Bridgette W. Wiggins (MSB # 9676)
Special Assistant Attorney General
Krissy Casey Nobile (MSB # 103577)
Special Assistant Attorney General
Alison E. O'Neal McMinn (MSB # 101232)
Special Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
Post Office Box 220
Jackson, MS 39205-0220
Telephone: 601-359-5654

F. Jerome Tapley – PHV
Hirlye R. (Ryan) Lutz III - PHV
CORY WATSON, PC
2131 Magnolia Avenue South, 2nd Floor
Birmingham, AL 35205

Carolyn G. Anderson – PHV
ZIMMERMAN REED LLP
1100 IDS Center, 80 South 8th Street
Minneapolis, MN 55402
Attorneys for Defendant Jim Hood

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Mississippi by using the Court's CM/ECF system on October 27, 2015. I further certify that all parties are represented by attorneys who are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ John W. Kitchens

John W. Kitchens

John W. Kitchens, (MSB# 101137)
KITCHENS LAW FIRM, P.A.
Post Office Box 799
Crystal Springs, MS 39059-0799
Telephone: 601-892-3067
Facsimile: 601-892-3057
jkitchens@kitchenslaw.net